

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA**

CHARLESTON DIVISION

IN RE: ETHICON, INC.)	MDL No. 2327
PELVIC REPAIR SYSTEM PRODUCTS)	
LIABILITY LITIGATION)	
)	

**APPLICATION OF BILL ROBINS III
FOR APPOINTMENT TO PLAINTIFFS' STEERING COMMITTEE**

COMES NOW, BILL ROBINS, III ("Robins") of the firm of HEARD, ROBINS, CLOUD & BLACK, L.L.P. ("Heard Robins"), and pursuant to this Court's Pre-Trial Order No. 1, respectfully submits this his Application for Appointment to the Plaintiffs' Steering Committee ("PSC"), and in support of such application, would show as follows:

Heard Robins represents clients in all four pelvic mesh MDLs pending before this Court, and has accepted representation in hundreds of pelvic mesh cases. Robins is the partner responsible for managing the firm's pelvic mesh cases.

Heard Robins is a fourteen lawyer firm with offices in Houston, Texas, Baton Rouge, Louisiana, and Santa Fe, New Mexico. Since the founding of the firm in 1998, Heard Robins has successfully represented tens of thousands of clients in mass tort cases, including cases involving Avandia, Baycol, Ephedra, Fen-Phen, the Ortho Evra Birth Control patch, asbestos, silica, benzene, and other toxic substances. Aside from pelvic mesh cases, the firm also currently represents clients who have suffered injuries from Yaz, Accutane, Paxil, Zoloft, and Depuy hip implants.

Robins graduated first in his class from the University of Houston Law Center in 1991. Since graduating from law school, he has been lead trial counsel and obtained favorable jury

verdicts in a wide variety of complex cases. Robins has also been lead counsel or co-counsel in several mass tort and class action cases which have been successfully resolved.

In March, 2011, Robins was appointed to the Plaintiffs' Steering Committee in the Avandia MDL pending before Hon. Cynthia M. Rufe of the U.S. District Court for the Eastern District of Pennsylvania, and served as Co-Lead Counsel and Chairman of the Bodily Injury Committee, and is currently serving as a member of the Fee and Cost Allocation Committee. Robins led a team of dozens of attorneys in completing extensive corporate discovery and simultaneously preparing multiple bellwether cases for trial in both state and federal courts. This effort required extensive cooperation among a number of plaintiffs' firms, and it ultimately led to the settlement of more than 25,000 personal injury claims that were pending in federal court and in State courts in California, New Mexico, Missouri and Pennsylvania. Robins continues to serve as lead and/or co-lead counsel on behalf of a number of state Attorneys General in Avandia-related litigation pending in state and federal court.

Robins was also lead counsel for the State of New Mexico in the Zyprexa MDL pending before Hon. Jack Weinstein of the U.S. District Court for the Eastern District of New York, and was extensively involved in the discovery and preparation for trial of the States' Attorney General Actions. The Zyprexa litigation involved substantial cooperation among counsel for the States. In addition, Robins was lead class counsel in the Ellsworth Park Superfund Site Litigation pending before Hon. John W. Darrah of the U.S. District Court for the Northern District of Illinois. Robins worked cooperatively with multiple Plaintiffs' firms, which resulted in the settlement of claims for over 600 homeowners.

Robins is currently working on the pelvic mesh litigation, and is willing and available to commit to serve on the PSC. In addition, Heard Robins is ready, willing and able to devote the significant financial and human resources necessary to support this commitment.¹

Based on the foregoing, Bill Robins III respectfully requests that this Court appoint him to the PSC.

Respectfully submitted,

HEARD, ROBINS, CLOUD & BLACK LLP

A handwritten signature in blue ink, appearing to read "Bill Robins III", is written over a horizontal line.

By:

Bill Robins III
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¹ Robins has reviewed the Plaintiffs' Proposed Counsel Organizational Structure submitted to the Court on March 19, 2012 for MDLs 2325, 2326 and 2327, and joins in the recommendation to the Court that the plan be accepted.

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on March 30, 2012, the foregoing Application for Appointment to Plaintiff's Steering Committee was electronically filed with the Clerk of the Court using the CM/ECF system and that electronic notice and service will be completed through the ECF system.

A handwritten signature in blue ink, appearing to read "Bill Robins III", is positioned above a horizontal line.

Bill Robins III